

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA**

|   |   |                               |
|---|---|-------------------------------|
| CALIFORNIA PUBLIC EMPLOYEES'                | ) | Civ. No. 24-cv-1743 (JMB/DTS) |
| RETIREMENT SYSTEM, Individually and         | ) |                               |
| on Behalf of All Others Similarly Situated, | ) | <u>CLASS ACTION</u>           |
|   | ) |                               |
| Plaintiff,                                  | ) | LEAD PLAINTIFF'S UNOPPOSED    |
|   | ) | MOTION REGARDING NOTICE OF    |
| vs.   | ) | RELATED CASE AND PROPOSED     |
|   | ) | STIPULATED SCHEDULE           |
| UNITEDHEALTH GROUP INC., et al.,            | ) |                               |
|   | ) |                               |
| Defendants.                                 | ) |                               |
|   | ) |                               |
|   | ) |                               |

---

Pursuant to Federal Rule of Civil Procedure 15(d), Lead Plaintiff California Public Employees' Retirement System ("CalPERS") hereby moves this Court for an order vacating all current deadlines for motion to dismiss briefing, and ordering the Parties to submit to the Court a status update on the motion to transfer pending in the related case *Faller v. UnitedHealth Group Inc.*, No. 1:25-cv-03799-AKH (S.D.N.Y.) by June 18, 2025 (30 days from the date of filing). This Motion is based upon the Notice of Hearing, the Notice of Related Case and Unopposed Motion for Proposed Stipulated Schedule, the pleadings and records on file, and such other matters and arguments as the Court may consider.

DATED: May 19, 2025

ROBBINS GELLER RUDMAN & DOWD LLP  
 DARREN J. ROBBINS (admitted *pro hac vice*)  
 SAM S. SHELDON (admitted *pro hac vice*)  
 LAURIE L. LARGENT (admitted *pro hac vice*)  
 ROBERT R. HENSSLER JR. (admitted *pro hac vice*)  
 JEFFREY J. STEIN (admitted *pro hac vice*)  
 JACK ABBEY GEPHART (admitted *pro hac vice*)

s/ Robert R. Henssler Jr.

---

ROBERT R. HENSSLER JR.

655 West Broadway, Suite 1900  
 San Diego, CA 92101  
 Telephone: 619/231-1058  
 darrenr@rgrdlaw.com  
 ssheldon@rgrdlaw.com  
 llargent@rgrdlaw.com  
 bhenssler@rgrdlaw.com  
 jstein@rgrdlaw.com  
 jgephart@rgrdlaw.com

Lead Counsel for Lead Plaintiff

TM SULLIVAN PLLC  
TIM SULLIVAN, MN 391528  
JAMES PORADEK, MN 290488 (OF COUNSEL)  
225 South Sixth Street, Suite 3900  
Minneapolis, MN 55402  
Telephone: 773/919-8667  
tim@tmsull.com  
jporadek@tmsull.com

Local Counsel for Lead Plaintiff